

EXHIBIT 8

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EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO
TRUCKING LLC,

Defendants.

Case No.

3:17-cv-00939-WHA

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
San Francisco, California
Friday, April 31, 2017
Volume I

Reported by: SUZANNE F. GUDELJ

CSR No. 5111

Job No. 2581643

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)
)
Plaintiff,)
)
vs.) Case No.
) 3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
)
Defendants.)

Videotaped deposition of PIERRE-YVES DROZ,
Volume I, taken on behalf of Defendants Uber
Technologies, Inc., Ottomotto LLC; Otto
Trucking LLC at the Law Offices of Morrison &
Foerster LLP, 425 Market Street, 33rd Floor,
San Francisco, California, beginning at 9:39
a.m. and ending at 2:52 p.m., on Friday,
March 31, 2017, before SUZANNE F. GUDELJ,
Certified Shorthand Reporter No. 5111.

1 is -- it's only a single channel to the court
2 reporter. There's no multiplexing.

3 Mr. Droz, you've been at Waymo or Google
4 since 2011?

5 A That is correct. 09:42:07

6 Q And before that you were at 510 Systems?

7 A Yes.

8 Q I want to ask you about a text message
9 string. This is Exhibit 1017.

10 (Defendant Exhibit 1017 marked by the court
11 reporter.)

12 BY MR. JACOBS:

13 Q Are you one of the correspondents on this
14 text message string?

15 A Yes, I think the -- I think the -- the dark 09:42:39
16 ones.

17 Q The dark entries are your entries?

18 A Yes.

19 Q The first one is French -- in French?

20 A That's correct. 09:42:55

21 Q If you turn to -- so down in the lower
22 right-hand corner, there's a stamp that we call the
23 Bates stamp. 4001 is the one I'm looking at.

24 A Okay. Don't have this exhibit.

25

1

2

3

4

Q And then at the top it's --

5

A 400 -- I'm sorry. Which --

09:43:21

6

Q 4001 on the lower right-hand corner.

7

A 4 double 0 -- 4004. Oh, I see. 4001.

8

Okay. I'm --

9

10

11

12

13

14

Q What's the puck?

15

A So I believe the puck here is the Velodyne

09:43:46

16

puck.

17

(Reporter clarification.)

18

The Velodyne puck. It's a -- it's a LiDAR

19

from Velodyne.

20

Q A LiDAR from Velodyne.

09:43:57

21

MR. JAFFE: Maybe you want to spell that

22

for the court reporter.

23

THE WITNESS: Okay. So Velodyne is

24

V-e-l-o-d-y-n-e.

25

BY MR. JACOBS:

09:44:07

1 Q Why did you call it the puck?

2 A That's what Velodyne refers to the --
3 that's how they call their device.

4 [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] 09:44:38

11 Q So took nothing new in it compared to what?

12 A To what we knew of -- of the -- the way
13 LiDARs are designed in general.

14 Q The way they're designed --

15 A The way LiDARs are designed in general. 09:44:51

16 Q In general?

17 A Mm-hmm.

18 Q And what do you mean "the way LiDARs are
19 designed in general" in the context of this email or
20 this text message string? 09:45:00

21 A From our knowledge of both our LiDARs or
22 other LiDARs in the market.

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] 09:45:19